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October 9, 2007
Project No. 8128.01.14

Mr. Matt McClincy
Oregon Department of Environmental Quality
2020 SW 4th Avenue, Suite 400
Portland, Oregon 97201-4987

Re: Evaluation of Groundwater Discharge to the Willamette River – RP Portland Site
Portland, OR
ECSI #155

Dear Matt:

On behalf of Siltronic Corporation (Siltronic), Maul Foster & Alongi, Inc. (MFA) reviewed the October 1, 2007 letter from AMEC Earth & Environmental (AMEC) on behalf of SLLI. The letter provided an evaluation of groundwater discharge to the Willamette River offshore of the Siltronic property, and adjacent Arkema and NW Natural (NWN) properties.

The objective of the evaluation is to determine if additional in-river investigation of transition zone water (TZW) is required for the Portland Harbor Remedial Investigation (RI). The evaluation includes a review and update of the conceptual hydrogeologic model (CHM) for the Rhone-Poulenc (RP) site and downgradient properties, based on upland data (collected by individual property owners) and in-river data (collected by LWG and Siltronic). MFA has developed the following brief comments regarding the data and interpretations in the letter.

Page 5 and related Figures 2 and 3 – With respect to the extent of the Deep Alluvial Gravel (DAG), the letter omits mention of Siltronic borings WS-13, WS-15, and WS-16. The DAG was detected in these borings at thicknesses ranging from approximately two to 23 feet thick, at depths up to 234 feet below ground surface (bgs). These data suggest that the extent of the DAG is greater than what is presented in the letter. The extent of the DAG may be critical for developing the CHM.

Page 17 and related Figure 5 – The statement "…TZW samples obtained by Siltronic in Region 2 did not detect any 1,2-DCB (MFA, 2005b)" omits reference to a low-level detection of 1,2-DCB in TZW in boring GP-30, which is shown on Figure 5. Also, chlorobenzene (CB, a degradation product of dichlorobenzene isomers) was detected in

TZW in boring GP-27, which is slightly downstream of Region 2. While the detections of 1,2-DCB and CB were low (0.85 and 1.4 ug/L, respectively), they should be considered in the evaluation of the CHM.

Page 18 – With respect to Region 3, MFA understands that Anchor Environmental, LLC has collected TZW samples along several transects offshore of the NWN and Siltronic properties. These data would appear to be relevant, although validated data may not yet be available.

These comments are intended to assist Portland Harbor stakeholders in their evaluation of the need for additional TZW investigation by LWG. These comments do not address characterization of the lateral and vertical extent of soil and groundwater impacts on the Siltronic property from former RP operations, which is not yet complete.

Please call either of us at (971) 544-2139 if you have questions or comments.

Sincerely,

Maul Foster & Alongi, Inc.

James G.D. Peale, R.G.
Senior Hydrogeologist

James J. Maul, R.G.
Principal Hydrogeologist

cc: Matt McClincy, DEQ
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